

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE BARRY WHITE FAMILY TRUST,
Plaintiff/

V

RODNEY DAVID OLIVER,

Defendant/

Case No. 1:24-cv-07509 (DLC)

**MEMORANDUM OF LAW IN SUPPORT OF MY MOTION FOR DECLARATORY RELIEF,
PROTECTIVE ORDER, AND SANCTIONS**

I, Rodney David Oliver, submit this memorandum of law in support of my motion for (1) declaratory relief under 28 U.S.C. §§ 2201–2202; (2) a protective order under Federal Rule of Civil Procedure 26(c); and (3) sanctions pursuant to Federal Rules of Civil Procedure 11 and 37, as well as Local Civil Rules of this Court and Judge Denise Cote’s Individual Practices.

I. INTRODUCTION

This motion arises because Ms. Dorothy Weber, who claims to represent the Barry White Family Trust, has repeatedly inserted herself into legal and financial matters outside her client’s rights — most notably, into the royalties and negotiations concerning my master recording of “Everlasting Bass,” which was sampled in the track “Like That.” Her conduct has caused confusion, delay, and misrepresentation in front of this Court and to third parties.

She has filed a Tolling Agreement that falsely suggests I granted rights I never authorized, participated in master-side settlement talks without my involvement, and has not submitted any declaration from the Trustees she claims to represent. I believe this behavior violates the Federal Rules and Court practices, and I respectfully ask this Court to step in.

II. GROUNDS FOR RELIEF

A. Declaratory Relief Under 28 U.S.C. §§ 2201–2202

Under the Declaratory Judgment Act, I respectfully request that the Court declare:

- I am the co-owner of the master sound recording “Everlasting Bass,” which was used in “Like That”;
- The Barry White Family Trust has no interest in that master recording;
- Ms. Weber, Plaintiff’s attorney, has no standing or legal authority to negotiate or interfere in royalty matters related to my master.

There is an actual controversy, as Plaintiff continues to assert influence over earnings and settlements involving my property.

B. Protective Order Under Fed. R. Civ. P. 26(c)

To protect my rights and stop further overreach, I ask this Court to enter a protective order barring Plaintiff and Ms. Weber from interfering in any negotiations or communications involving royalties from the master sound recording, unless and until this Court finds they have a valid claim or authorization.

Emails dated March 21, 2025 and February 25, 2025 show Ms. Weber and Sony/Epic attorneys discussing how the money from the master should be “held by the Court.” I was never included. That is not lawful, and I need protection from it going forward.

C. Sanctions Under Fed. R. Civ. P. 11 and 37

Sanctions are warranted based on the following:

1. Undisclosed Tolling Agreement Misrepresentation

Ms. Weber submitted a Tolling Agreement dated July 2024 (Dkt. 138, Ex. A) that implies I granted rights — I did not. I didn’t sign it, I wasn’t told about it, and she has no authority to speak for me.

2. False Representations About Third Parties

Ms. Weber told the Court that “Plaintiffs have not sued or settled with any third parties.” That’s directly contradicted by her own Tolling Agreement and settlement emails.

3. Unauthorized Settlement Letter

On August 9, 2024, Ms. Weber sent a letter offering settlement terms on behalf of Warner Music Group. No one from Warner signed it. She had no authority to speak for them or for me.

4. Overreach Into My Master Recording Earnings

Plaintiff has never claimed to own any master recordings. Yet Ms. Weber’s emails show she is negotiating with Sony/Epic about holding back money earned from the use of *my* master — “Everlasting Bass” — in “Like That.” That is overreach and interference.

5. Failure to Disclose Trustee Authority

Ms. Weber continues to file motions, participate in hearings, and present herself as counsel for the Barry White Family Trust, yet she hasn’t filed any declaration from a Trustee authorizing her or this lawsuit.

III. LEGAL STANDARD

Under **Rule 11(b)**, attorneys must certify that all legal and factual claims are well-grounded in law and fact. False statements or filings made for improper purposes violate Rule 11.

Judge Denise Cote has held in *In re Riskified Ltd. Sec. Litig.*, No. 22-cv-3545 (S.D.N.Y. 2023), that unsupported allegations and misleading factual statements violate Rule 11 and warrant dismissal or sanctions. In *McDermott v. Monday Monday, LLC*, No. 17-cv-9230-DLC, Judge Cote emphasized the need for counsel to affirm their authority to file on behalf of clients. That has not happened here.

Rule 37 permits sanctions when a party fails to cooperate in discovery or conceals material facts — including third-party negotiations and escrow communications that I was left out of.

IV. APPLICABLE RULES AND PRACTICES

This motion is based on:

- **Fed. R. Civ. P. 11, 26, 37, and 17(a)(1)**
- **Local Civil Rules 1.5(b)(5), 11.1, and 26.3**
- **Judge Denise Cote's Individual Practices §§ 1(A), 3(A)-(C), and 4(A)**

The Court has the discretion to impose sanctions, issue declaratory findings, and enter protective orders to prevent further harm.

V. CONCLUSION

I am not just acting for my own benefit but also in the interest of transparency and the legacy of Barry White. If the Trustees authorized this case and Ms. Weber's actions, they should file a declaration and say so under oath. If they did not, this case must be addressed accordingly.

Therefore, I respectfully ask this Court to:

1. Enter declaratory relief confirming my exclusive ownership of the master recording;
2. Issue a protective order barring Plaintiff and Ms. Weber from further interference;
3. Compel the Trustees to submit sworn declarations confirming their authorization;
4. Impose sanctions for violations of Rule 11 and Rule 37;
5. Grant any further relief the Court deems just and proper.

Dated: July 25, 2025

Respectfully submitted,

/s/Rodney David Oliver

Pro Se

11074 Oso Ave

Chatsworth CA 91311

Rodneyolivermusic@gmail.com

**Request for Signed Agreements &
Copyright Transfer Documentation –
Urgent Clarification Required**

...EXHIBIT A

From: Necole Key

necole@ladykeymanagement.com

To: Matson, Timothy C.

tmatson@foxrothschild.com, Dorothy Weber

dorothy@musiclaw.com, FinanR@gtlaw.com

FinanR@gtlaw.com,

dalia.auerbach@epicrecords.com

dalia.auerbach@epicrecords.com, Rodney

rodneyocali@yahoo.com

Sent: Tuesday, February 25 at 1:51 PM

Dear Ms. Weber and Epic Records Legal Team,

As Rodney O's Rights Manager, I have the obligation to protect his rights and interests in all matters concerning his intellectual property, licensing agreements, and financial entitlements. To fulfill this duty effectively, I require full clarity and transparency from all parties involved.

1. Request for Signed Agreements from Epic Records

Epic Records has asserted rights over the master recording and composition for Like That (including the Kendrick Lamar verse) and the use of Everlasting Bass. However, no fully executed agreements have been provided to confirm Epic's legal authority over these rights.

Accordingly, I am requesting the immediate production of the following:

- A fully executed and signed agreement proving Epic Records obtained a valid license for both the master recording and composition incorporating Everlasting Bass.
- Proof of clearance for Kendrick Lamar's verse, confirming that all relevant stakeholders approved its inclusion.

- Any correspondence or documentation that supports Epic's claim of legal authority over these rights, including revenue allocations.

Failure to provide these agreements within three (3) business days will necessitate legal action to ensure Rodney O's rights are properly protected.

2. Dorothy Weber's Involvement & Request for Copyright Transfers

Ms. Weber, as legal counsel for the Barry White Family Trust, your involvement in Rodney O's negotiations with Epic Records is concerning. Your role should be strictly limited to Barry White's estate, yet you have actively interfered in ongoing discussions between myself (acting as Rodney's rights manager) and Epic Records.

Furthermore, your copyright registration does not name the Barry White Family Trust as the registered owner. Therefore, I am formally requesting:

- A valid copyright transfer document confirming that the previous copyright owner lawfully transferred rights to the Barry White Family Trust.
- If no such letter of assignment or transfer exists, your claims lack prima facie standing and must be immediately withdrawn.
- A written explanation clarifying why you are interfering in Rodney O's licensing discussions with Epic, given that you represent a separate legal interest.

3. Next Steps for Transparency & Resolution

To move forward in good faith and ensure that all rights are properly handled, I expect the following actions:

1. Epic Records must provide the requested signed agreements within three (3) business days from today.
2. Ms. Weber must produce a valid copyright transfer document for Barry White's estate or formally withdraw any claims related to copyright ownership.

3. Immediate cessation of any interference in
Rodney O's licensing discussions with Epic
Records.

As Rodney O's rights manager, I must have full
clarity and transparency to ensure that his
interests are protected. Please confirm receipt of
this request and provide the requested
documentation within the specified timeframe.

Sincerely,

Necole Key

Rights Manager

www.ladykeymanagement.com

[626-598-6647](tel:626-598-6647)

HERBSMAN HAFER WEBER & FRISCH, LLP
ATTORNEYS AT LAW
494 EIGHTH AVENUE, SIXTH FLOOR NEW YORK, NEW
YORK 10001

JONAS E. HERBSMAN
J. JEFFREY HAFER DOROTHY M. WEBER
MICHAEL B. FRISCH

RAKHIL KALANTAROVA

JAMES E. DOHERTY OF COUNSEL

TELEPHONE (212) 245-4580
TELECOPIER (212) 956-6471

WRITER'S E-MAIL:
dorothy@musiclaw.com

August 9, 2024

Via Email: lrogers@foxrothschild.com

Leron E. Rogers, Esq.
Fox Rothschild, LLP
999 Peachtree Street NE
Suite 1500
Atlanta, GA 30309

Re: **"Like That"**

Dear Leron:

We have the following settlement offer from The Barry White Family Trust and Warner (jointly "White"):

1. A non-recoupable payment of \$50,000.
2. 30% copyright ownership of the Future/Metro Boomin song "Like That" including the right to collect 30% of 100% of all income generated from inception and in perpetuity.
3. **25% of 100% of all income generated from inception and in perpetuity for income received from the "Like That" master.**
4. ¹To the extent any collections have occurred prior to the date hereof, payment of our client's 30% of those monies must be paid at the time of signing of a settlement agreement.
5. **Your clients will have no future authority to license any part of the E²verlasting Bass song which includes the Barry White interpolation.**

¹ Ms. Weber listed Warner in the letter stating they are jointly aligned in this matter. Yet no Warner rep signature or name of rep at Warner was given. Is this done to mislead and pressure us? Why is Warner not jointly aligned with the trust in the present litigation?

² nowhere in this letter is the song title "I'm gonna Love you better just a little bit more" mentioned. Plaintiff was trying to pressure us to sign over our ownership for an alleged infringement without due process. With the assistance of Defendants attorney Leron Rogers. This is after I offer 45% of the composition due to Epic not having a valid agreement. Wouldn't 45% of the composition be in Ms. Weber clients best interest. Somehow both counsels put it in the best interest of Epic

HERBSMAN HAFER WEBER & FRISCH, LLP

Leron E. Rogers, Esq.

August 9, 2024

Page | 2

6. Each copyright owner to administer their own share of “Like That”, including as to issuance of any synchronization or other licenses.³
7. General Releases.
8. Copyright Credit for Barry White.

Very truly yours,

HERBSMAN HAFER WEBER
& FRISCH, LLP

/s/ Dorothy M. Weber

Dorothy M. Weber, Esq.

DMW/rr

³ In one sentence Ms. Weber states Rodney will lose complete control of his music. In the next sentence she puts that each owner wil control their own share. Is that a deception to have us assume we weren't signing over ownership ?

EXHIBIT C

THE COURT: Thank you.

Again, what is the name of the plaintiff's musicologist?

MS. WEBER: Dr. Ronald Sadoff, S-a-d-o-f-f.

THE COURT: Thank you.

Are there any additional parties that you plan to add to this litigation, Ms. Weber?

MS. WEBER: No, your Honor.

THE COURT: And have you sued or entered a settlement agreement with the parties associated directly with the work "Like that"?

MS. WEBER: We have not sued or settled with them. Initially when we wrote the cease-and-desist letter, they were part of that chain. Sony, Epic, and the publishing companies for the coauthors of "Like That" have agreed to hold all of the moneys in escrow pending the determination of the Court.

THE COURT: OK.

MS. WEBER: So, relying on their indemnification from Mr. Oliver, again, we thought, in the interest of streamlining the case and not bringing in unnecessary parties who had agreed to be bound by the Court's order, we thought it was the most

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

BWT - 000259

Ricardo Rosado

From: Matson, Timothy C. <tmatson@foxrothschild.com>
Sent: Tuesday, February 25, 2025 6:22 PM
To: Dorothy Weber; FinanR@gtlaw.com; dalia.auerbach@epicrecords.com
Subject: RE: Request for Signed Agreements & Copyright Transfer Documentation – Urgent Clarification Required

Dorothy,

This is to confirm that I have directed Necole Key to stop sending correspondence to Counsel for Barry White and Epic Records.

Best regards,

Tim



Timothy C Matson
Counsel

City Center
33 S. Sixth Street, Suite 3600
Minneapolis, MN 55402

(612) 607-7064
 (612) 229-4109
 (612) 607-7100
 tmatson@foxrothschild.com

Learn about our new brand.

From: Necole Key <necole@ladykeymanagement.com>
Sent: Tuesday, February 25, 2025 3:52 PM
To: Matson, Timothy C. <tmatson@foxrothschild.com>; Dorothy Weber <dorothy@musiclaw.com>; FinanR@gtlaw.com; dalia.auerbach@epicrecords.com; Rodney <rodneyocali@yahoo.com>
Subject: [EXT] Request for Signed Agreements & Copyright Transfer Documentation – Urgent Clarification Required

Dear Ms. Weber and Epic Records Legal Team,

Ricardo Rosado

From: Dorothy Weber
Sent: Tuesday, February 25, 2025 2:08 PM
To: Matson, Timothy C.
Subject: FW: Response to Improper Demand for Communications
Attachments: Letter to Tim Matson 2.24.2025-C.PDF

Importance: High

Dear Tim: Please advise Ms. Keys to refrain from communicating with me directly. Please confirm immediately.

Very truly yours,

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Necole Key <necole@ladykeymanagement.com>
Sent: Tuesday, February 25, 2025 2:01 PM
To: Dorothy Weber <dorothy@musiclaw.com>; Matson, Timothy C. <tmatson@foxrothschild.com>; Rodney <rodneyocali@yahoo.com>
Subject: Response to Improper Demand for Communications

Dear Ms. Weber,

This letter serves as a formal response to your request for communications involving myself, Necole Key. After reviewing the nature of your request, it is clear that your demand lacks a valid legal basis.

1. Attorney-Client Privilege & Work Product Protection

I, Necole Key serves as Rodney Oliver's rights manager and has been involved in privileged discussions regarding legal strategy, negotiations, and case management. Any communications containing legal advice or strategy discussions with counsel are protected under attorney-client privilege and the work product doctrine. These privileges prevent disclosure of such information.

As you are aware, privileged communications cannot be compelled unless an express waiver is granted by the privilege holder. No such waiver has been given.

2. Lack of Proper Legal Authority

Your request for my, Necole Key's communications is not supported by any valid legal process:

- No court order or valid subpoena has been issued.

From: FinanR@gtlaw.com
To: [Dorothy Weber](mailto:Dorothy.Weber@musiclaw.com); SmithJ@GTLAW.com
Cc: [Jonas Herbsman](mailto:Jonas.Herbsman@musiclaw.com)
Subject: RE: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Motion to Intervene
Date: Friday, March 21, 2025 7:35:27 PM
Attachments: [image001.png](#)

Thanks for the call today.

I spoke with Eric Taylor at Epic. He will get the info on the earnings and discuss with Dave Jacoby Sony's thoughts on having the money held by the court. Will have more info on Monday.

Rob

Robert J. Finan
Of Counsel

Greenberg Traurig, LLP
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T +1 678.553.2206 | F +1 678.553.2207
FinanR@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



From: Dorothy Weber <dorothy@musiclaw.com>
Sent: Friday, March 21, 2025 11:22 AM
To: Finan, Robert J. III (OfCnl-Atl-Ent) <FinanR@gtlaw.com>; Smith, Jeffrey (Shld-Atl-Ent) <SmithJ@GTLAW.com>
Cc: Jonas Herbsman <jonas@musiclaw.com>
Subject: FW: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Motion to Intervene

EXTERNAL TO GT

Another round just filed.

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: FinanR@gtlaw.com
To: [Dorothy Weber](mailto:Dorothy.Weber@musiclaw.com); SmithJ@GTLAW.com
Cc: [Jonas Herbsman](mailto:Jonas.Herbsman@musiclaw.com)
Subject: RE: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Motion to Intervene
Date: Friday, March 21, 2025 11:33:37 AM
Attachments: [image001.png](#)
[Dkt. 47 - Necole Key's Motion to Intervene as an individual.pdf](#)

Thank you Dorothy.

Rob

Robert J. Finan
Of Counsel

Greenberg Traurig, LLP
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T +1 678.553.2206 | F +1 678.553.2207
FinanR@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



From: Dorothy Weber <dorothy@musiclaw.com>
Sent: Friday, March 21, 2025 11:22 AM
To: Finan, Robert J. III (OfCnl-Atl-Ent) <FinanR@gtlaw.com>; Smith, Jeffrey (Shld-Atl-Ent) <SmithJ@GTLAW.com>
Cc: Jonas Herbsman <jonas@musiclaw.com>
Subject: FW: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Motion to Intervene

EXTERNAL TO GT

Another round just filed.

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E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: [Dorothy Weber](#)
To: [FinanR@gtlaw.com](#); [Ricardo Rosado](#); [SmithJ@GTLAW.com](#)
Cc: [Jonas Herbsman](#)
Subject: RE: CERTIFICATE OF SERVICE Case No.: 24cv7509 (DLC)/JOINT DEFENSE
Date: Monday, March 24, 2025 4:20:00 PM
Attachments: [image001.png](#)

He did previously file a notice of appearance. The good news is that he agrees to personal jurisdiction. He also says he supports whatever Key is doing. I have a draft letter to the Court which I will send you before the end of the day for your thoughts and/or comments.

By separate email, I am going to send you some of her social media posts about filing criminal charges....

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: [FinanR@gtlaw.com](#) <FinanR@gtlaw.com>
Sent: Monday, March 24, 2025 4:16 PM
To: [Ricardo Rosado](#) <ricardo@musiclaw.com>; [SmithJ@GTLAW.com](#)
Cc: [Dorothy Weber](#) <dorothy@musiclaw.com>
Subject: RE: CERTIFICATE OF SERVICE Case No.: 24cv7509 (DLC)

Has Rodney Oliver ever submitted a motion to represent himself pro se?

Robert J. Finan
Of Counsel

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T +1 678.553.2206 | F +1 678.553.2207
FinanR@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



From: [Ricardo Rosado](#) <ricardo@musiclaw.com>
Sent: Monday, March 24, 2025 3:50 PM
To: [Finan, Robert J. III \(OfCnl-Atl-Ent\)](#) <FinanR@gtlaw.com>; [Smith, Jeffrey \(Shld-Atl-Ent\)](#) <SmithJ@GTLAW.com>
Cc: [Dorothy Weber](#) <dorothy@musiclaw.com>

From: [Dorothy Weber](#)
To: FinanR@gtlaw.com; [Jeffrey M. Smith \(smithj@gtlaw.com\)](mailto:Jeffrey M. Smith (smithj@gtlaw.com))
Subject: FW: Final Cease and Desist – Misuse of Communications, Misrepresentation
Date: Wednesday, March 26, 2025 3:35:00 PM

It didn't keep her quiet for sure....her latest missive to me!

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Necole Key <necole@ladykeymanagement.com>
Sent: Wednesday, March 26, 2025 3:30 PM
To: Dorothy Weber <dorothy@musiclaw.com>
Subject: Final Cease and Desist – Misuse of Communications, Misrepresentation
Notice

Dear Ms. Weber,

I am writing to issue a final cease and desist notice regarding the
personal and professional communications, and the false and da
conduct made by you, Epic and your client, The Barry White Fo

From: FinanR@gtlaw.com
To: [Dorothy Weber](mailto:Dorothy.Weber@musiclaw.com); SmithJ@GTLAW.com
Subject: RE: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Order
Date: Wednesday, March 26, 2025 3:27:21 PM
Attachments: [image001.png](#)

Unfortunately, it didn't tell her to keep quiet.

Rob

Robert J. Finan
Of Counsel

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T +1 678.553.2206 | F +1 678.553.2207
FinanR@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



From: Dorothy Weber <dorothy@musiclaw.com>
Sent: Wednesday, March 26, 2025 1:27 PM
To: Finan, Robert J. III (OfCnl-Atl-Ent) <FinanR@gtlaw.com>; Smith, Jeffrey (Shld-Atl-Ent) <SmithJ@GTLAW.com>
Subject: FW: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Order

EXTERNAL TO GT

Here is the Judge's order.....no conference but it looks like she is keeping them on a short leash.

I will keep you both posted.

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

Copyright

Registration Number / Date:

PA0002514816 / 2025-01-15

Type of Work:

Music

Title:

Like That.

Application Title:

Like That.

Appears In:

WE DON'T TRUST YOU

Date of Creation:

2024

Date of Publication:

2024-03-22

Copyright Claimant:

Kendrick Lamar Duckworth, Transfer: By written agreement. Address: c/o Universal Music Publishing Group, 1550 W McEwen Drive, Suite 400, Franklin, TN, 37067, United States.

Metro Boomin' Want Some More, Transfer: By written agreement. Address: c/o Universal Music Publishing Group, 1550 W McEwen Drive, Suite 400, Franklin, TN, 37067, United States.

Authorship on Application:

Kendrick Lamar, pseud. of Kendrick Lamar Duckworth; Citizenship: United States. Authorship: music, lyrics.

Metro Boomin, pseud. of Leland Tyler Wayne (author of pseudonymous work); Citizenship: United States. Authorship: music, lyrics.

Future, pseud. of Nayvadius Cash (author of pseudonymous work); Citizenship: United States. Authorship: music, lyrics.

Kobe Hood; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Basis of Claim:

music, lyrics.

Rights and Permissions:

Universal Music Publishing Group, 1550 W McEwen Drive, Suite 400,
Franklin, TN, 37067, United States, nacopyright@umusic.com

Material Excluded:

music, lyrics, Samples "Everlasting Bass" written by Joe Cooley and Rodney Oliver; Samples "Eazy Duz It" written by William Collins, Lorenzo Patterson, George Clinton, Abrim Tilmon, Bernie Worell, Eric Wright, and Andre Young pka Dr. Dre.

Description:

Electronic file (eService)

Nation of First Publication:

United States

Names:

Duckworth, Kendrick Lamar

Lamar, Kendrick, pseud.

Wayne, Leland Tyler

Metro Boomin, pseud.

Cash, Nayvadius

Future, pseud.

Hood, Kobe

Metro Boomin' Want Some More

USCO Catalog Link:

https://publicrecords.copyright.gov/detailed-record/voyager_38031905

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EXHIBIT G

Copyright

Registration Number / Date:

SR0000987835 / 2024-01-18

Registration Class:

SR

Type of Work:

Sound Recording

Title:

Works Published on the Album Me and Joe.

Application Title:

Works Published on the Album Me and Joe.

Appears In:

Me and Joe

Title of Works:

We've Arrived (Oh! But Yes), Album Track Number 1

This Is for the Homies, Album Track Number 2

Me and Joe, Album Track Number 3

Let's Have Some Fun, Album Track Number 4

Supercuts (Yeah Boy), Album Track Number 5

Give Me the Mic, Album Track Number 6

It's My Rope, Album Track Number 7

Cooley High, Album Track Number 8

Nobody Disses Me, Album Track Number 9

Everlasting Bass, Album Track Number 10

Latest Transaction Date and Time:

2024-02-03T03:20:04

Copyright Claimant:

Rodney Oliver. Address: 451 Discovery Lane, 321, Brea, CA, 92821, United States.

Authorship on Application:

Rodney O, pseud. of Rodney Oliver (author of pseudonymous work);

Citizenship: United States. Authorship: Sound recording(s): All Tracks Being Registered.

Joe Cooley; Citizenship: United States. Authorship: Sound recording(s): All Tracks Being Registered.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Barry White Family Trust U/A/D December 19, 1980,
Plaintiff,

v.

Rodney David Oliver,
Defendant.

Case No. 1:24-cv-07509 (DLC)

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2025, I caused a true and correct copy of the attached
NOTICE OF MOTION For DECLARATORY RELIEF, PROTECTIVE ORDER, AND SANCTIONS
to be served via email upon the following:

Dorothy M. Weber, Esq.
Shukat Arrow Hafer Weber & Herbsman, LLP
494 8th Avenue, Suite 600
New York, NY 10001
Email: dorothy@musiclaw.com

Judith Ann Meyers, Pro Se
Barry White Family Trust U/A/D December 19, 1980
Email: jameyers68@gmail.com

Joe Cooley, Pro Se
248 E 157th Street
Gardena, CA 90248
Email: cooleyjoe011@gmail.com

I declare under penalty of perjury under the laws of the United States that the foregoing is
true and correct.

Respectfully submitted,

/s/ Rodney David Oliver
Rodney David Oliver (Pro Se Defendant)
11074 Oso Avenue
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